

Exhibit A

Hadnott v. Unknown Unnamed Officers of the Chicago Police Department, et al.
07 C 6754



**City of Chicago
Richard M. Daley, Mayor**

Department of Law

Mara S. Georges
Corporation Counsel

Employment and Policy Litigation
Suite 1020
0 North LaSalle Street
Chicago, Illinois 60602
(312) 744-5100
(312) 744-3989 (FAX)
(312) 744-5131 (TTY)
<http://www.cityofchicago.org>

VIA FACSIMILE

February 13, 2008

Irene K. Dymkar, Esq.
300 West Adams Street, Ste. 330
Chicago, Illinois 60606

Re: Hadnott v. City of Chicago, et al. 07 C 6754

Dear Ms. Dymkar:

In light of Judge Coar's inquiry during our recent status conference regarding identifying the unknown officers, we write to request whatever identifying information your clients have that is not included in the current complaint that might assist in our efforts to identify the unknown officers. For example:

1. What are the physical descriptions of the three officers whom Plaintiff Jonathan Hadnott alleges stopped him at or near West 56th Street and South Racine Avenue on December 4, 2006 (e.g., race, gender, hair color, hair length, eye color, height, weight, salient characteristics such as tattoos or facial hair)?
2. What type of clothing were these three individuals wearing at the time they allegedly stopped Jonathan Hadnott on the date and location noted above? Were they in uniform (and if so, please describe them) or were they wearing civilian clothing (if so, please describe)?
3. What type of vehicle did Plaintiff Jonathan Hadnott get into with the individuals purported to be officers on December 4, 2006? Was it a marked squad car or some other type of vehicle? If it was a marked squad, did your clients obtain the vehicle number of the car?
4. Did the same three of the officers enter the residence located at 7322 South Green Street? If not, how many of them did? What were the physical descriptions of any other officers who allegedly entered?

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5. Do your clients have any other information that will assist us in identifying the unknown defendants who are named in the First Amended Complaint?

Please provide this information as soon as possible. If you have any questions or wish to discuss this matter, please feel free to contact us.

Sincerely,

A.C. Kosztya
Ashley C. Kosztya
Assistant Corporation Counsel
(312) 744-9332

Melanie Patrick Neely
Melanie Patrick Neely
Assistant Corporation Counsel
(312) 744-5114

Fax Confirmation Report

Date/Time : FEB-13-2008 12:38PM WED
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Abbreviations:

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Comments:

From:	ACC Ashley C. Koszyra	Direct No:	312-744-9332
Date:	February 13, 2008	Pages:	3, including cover sheet
To:	Irene K. Dymka, Esq.	Fax No.:	312-653-3489
Subject:	Handout V, City, et al., 07 C 6754		

Fax: 312-744-3989

City of Chicago - Department of Law

Fax Transmission

Irene K. Dymkar
Attorney at Law
300 West Adams, Suite 330
Chicago, IL 60606-5107
(312) 345-0123
fax (312) 853-3489
dymkarlaw@ameritech.net

March 15, 2008

Delivered by fax and mail

Ashley C. Kosztya
City of Chicago, Department of Law
30 N. LaSalle, Suite 1020
Chicago, IL 60606

Melanie Patrick Neeley
City of Chicago, Department of Law
30 N. LaSalle, Suite 1020
Chicago, IL 60606

Re: Hadnott v. City of Chicago, 07 C 6754

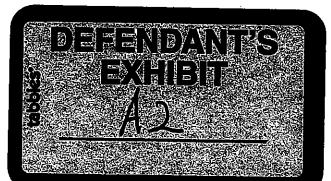
Dear Counsel:

You have asked me to obtain more of a description of the three police officers who are the subject of this lawsuit involving the Hadnott family. Here is what I have:

- 1) car - unmarked, dark-colored (but not black) Chevy-type car, equipped with a police computer
- 2) officers - 3 white, clean shaven, plain clothes officers in one vehicle, wearing jeans and sweatshirts, one wearing a baseball cap
 - 1 - about 6'2", 160 - 170 lbs., about 30 years old
 - 2 - about 6'2", 175 - 185 lbs., about 30 years old
 - 3 - about 5'9", 165 - 175 lbs., in his 20's

All three officers entered the Hadnott home.

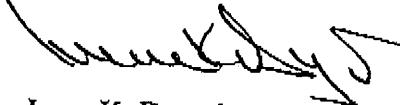
It seems to me that defendants would have called in to check for warrants or investigative alerts. Since they were concerned about guns, defendants also would have done a check for a firearms ownership identification card. Just the mere fact that there were three officers assigned to the same unmarked car should make identifying the officers easier.



If you are not able to identify the officers, then I will consider adding a *Monell* claim regarding failure to supervise and train. It is astounding that the police could stop someone on the street, place him in a police vehicle, transport him to a residence, and enter and search a home, detaining people inside, but there would be no trace of this police activity and, hence, no accountability.

If there is anything to discuss before court this week, please feel free to call.

Sincerely,



Irene K. Dymakr



**City of Chicago
Richard M. Daley, Mayor**

Department of Law

Mara S. Georges
Corporation Counsel

Employment and Policy Litigation
Suite 1020
30 North LaSalle Street
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<http://www.cityofchicago.org>

VIA FACSIMILE

March 17, 2008

Irene K. Dymkar, Esq.
300 West Adams Street, Ste. 330
Chicago, Illinois 60606

Re: Hadnott v. City of Chicago, et al. 07 C 6754

Dear Ms. Dymkar:

We are in receipt of your letter dated March 15th containing the description of the individuals whom your clients allege are the unknown officers. At this point in time, as there is no information in our client's possession pertaining to the allegations present in this lawsuit, we ask that all three of your clients separately examine a photo array in order to determine which (if any) of the officers from the 7th or 9th Districts are the unknowns in question.

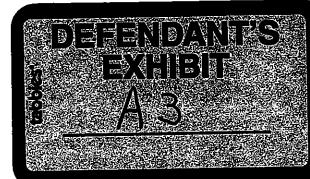
We are available to conduct these photo arrays on either of two days:

- April 2, 2008 between the hours of 9:00 a.m. to 12:00 p.m.
- April 7, 2008 between the hours of 9:00 a.m. to 2:00 p.m.

If your clients are unable to make these dates, please provide us with a list of at least three dates and times you will be available to accompany them to Police Headquarters after April 7th for the photo arrays.

Sincerely,

Ashley C. Kosztya
Assistant Corporation Counsel
(312) 744-6922



Fax Confirmation Report

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HR: Host Receive **PR: Polled Remote** **FA: Fail** **RP: Report** **G3: Group3**
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Comments:

To:	Irene K. Dymkar	Fax No.:	312-653-3489
Date:	March 17, 2008	Pages:	2, including cover sheet
From:	ACC Ashley C. Koszla	Direct No.:	312-744-6922
Subject:	Re:hardt v. City of Chicago, 07 C 6754		

Fax: 312-744-3989

City of Chicago - Department of Law

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March 19, 2008

Delivered by fax and mail

Ashley C. Kosztya
City of Chicago, Department of Law
30 N. LaSalle, Suite 1020
Chicago, IL 60606

Melanie Patrick Neeley
City of Chicago, Department of Law
30 N. LaSalle, Suite 1020
Chicago, IL 60606

Re: Hadnott v. City of Chicago, 07 C 6754

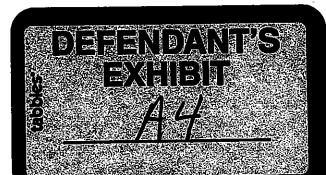
Dear Counsel:

Given the conversation with Ashley Kosztya on today's date, plaintiffs will decline your offer to participate in a photo array of police officers. This is neither an efficient nor accurate method to identify the officers.

Please provide me with the attendance and assignment sheets for the police officers for the 7th and 9th Districts and any other districts that might have covered West 56th Street and South Racine Avenue or 7322 S. Green on December 4, 2006, from 2:00 PM until 6:00 PM, together with information as to which officers were in plain clothes and which were in unmarked cars. If the attendance and assignment sheets do not indicate the number of partners, please provide me with that information also.

Also, please provide me with all LEADS inquiries made regarding any of the plaintiffs, as well as regarding Brandell Betts (who will be added as a plaintiff), on December 4, 2006, from 2:00 PM until 6:00 PM. Upon first contact with my clients, the officers involved in this case should have immediately submitted an inquiry to the state warrant system (LEADS) to receive warrant data and officer protection information within 10 seconds. In order to submit an inquiry, the officer must be certified by the state and have his own password information. The LEADS Agency Coordinator should be able to quickly determine whether any LEADS inquiries were submitted regarding my clients on the date and at the time in question. An alternative strategy would be for you to check for LEADS inquiries during that time period by any officers from the relevant district(s) working during the corresponding shift.

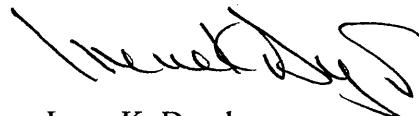
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CITY POLICE POLICY DIVISION
MAR 24 PM 12:36



As you know, time is of the essence. Please notify me immediately if you are willing to assist me with the requested informal discovery. Otherwise, my only option will be to begin substantial and time-consuming formal discovery of numerous individual employees of the police department on this peripheral issue.

I look forward to hearing from you soon.

Sincerely,



Irene K. Dymkar

Exhibit B

Hadnott v. Unknown Unnamed Officers of the Chicago Police Department, et al.
07 C 6754

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JONATHAN HADNOTT, JESSIE HADNOTT, and KEVIN HUNT,)
)
)
Plaintiffs,) Case No. 07 C 6754
)
v.) Judge David H. Coar
)
UNKNOWN UNNAMED OFFICERS OF THE CHICAGO POLICE DEPARTMENT, and CITY OF CHICAGO,) Magistrate Judge Schenkier
)
)
Defendants.)

NOTICE OF ORAL DEPOSITION

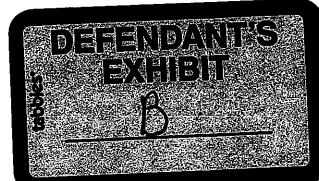
To: Ashley C. Kosztya
 City of Chicago, Department of Law
 30 North LaSalle Street, Suite 1020
 Chicago, IL 60602

YOU ARE HEREBY NOTIFIED that plaintiffs will take the oral deposition of the following persons at 300 W. Adams Street, Suite 330, Chicago, Illinois 60606, on the date and time indicated:

<u>DEPONENT</u>	<u>DATE</u>	<u>TIME</u>
7th District Commander Keith Calloway	May 21, 2008	1:00 PM
Person most knowledgeable as to who the unknown defendants are or most likely to have information as to who they might be.	May 21, 2008	3:00 PM

The deponent is hereby requested to bring the following documents and materials:

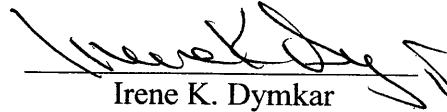
Pictures of all police officers working in the 7th District of the Chicago Police Department on December 4, 2006, or any other district that may have been involved in this arrest and search.



Attendance and assignment records for all police officers working in the 7th District of the Chicago Police Department on December 4, 2006, or any other district that may have been involved in this arrest and search.

The depositions will be taken before a notary public and certified shorthand reporter and will be recorded stenographically.

Dated: May 15, 2008



Irene K. Dymkar

CERTIFICATE OF SERVICE

I, Irene K. Dymkar, an attorney, certify that on the 15th day of May, 2008, a copy of PLAINTIFFS' NOTICE OF ORAL DEPOSITION was served upon the attorney for defendants named above by personal delivery.

Dated: May 15, 2008



Irene K. Dymkar

IRENE K. DYMKAR
Attorney for Plaintiff
300 West Adams, Suite 330
Chicago, IL 60606-5107
(312) 345-0123